

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

No. 2:15-MD-02641-PHX-DGC

This Document Relates to:

Julia Nichols

Civil Action No.: 2:17-cv-00868-DGC

**MOTION FOR SUBSTITUTION OF COUNSEL**

Counsel moves this Court for an Order substituting Matthew R. McCarley of Fears Nachawati, PLLC, in place of, Joseph J. Cappelli of Bern Cappelli.

1. Plaintiff Julia Nichols, requests that she be represented by Matthew R. McCarley of Fears Nachawati, PLLC. (See the Consent Orders Granting Substitution of Attorney, attached hereto as Exhibit A).

2. Joseph J. Cappelli of Bern Cappelli consents to this substitution (See the Consent Orders Granting Substitution of Attorney, attached hereto as Exhibit A).

3. Based on the foregoing, Julia Nichols requests that this Court grant her request for substitution of Matthew R. McCarley of Fears Nachawati, PLLC in this action.

1 Date: September 3, 2019

Respectfully submitted,

2 **FEARS NACHAWATI**

3 By: /s/ Matthew R. McCarley

4 Matthew R. McCarley

Texas Bar No. 24041426

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5 **FEARS NACHAWATI, PLLC**

6 5473 Blair road

Dallas, TX 75231

7 *Attorney for Plaintiff*

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9 **CERTIFICATE OF SERVICE**

10 I hereby certify that on this 3rd day of September, 2019, I electronically transmitted  
11 the attached document to the Clerk's Office using the CM/ECF System for filing and  
12 transmittal of a Notice of Electronic Filing.

13 /s/ Matthew R. McCarley

14 Matthew R. McCarley